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December 28, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th St. SW  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation: CG Docket Nos. 10-51 and 03-123**

Dear Ms. Dortch,

On December 28, 2018, Greg Hlibok, Chief Legal Officer, CSDVRS, LLC (“ZVRS”) met with Robert Aldrich, Legal Advisor, Consumer and Government Affairs Bureau and Eliot Greenwald, Deputy Chief, Disability Rights Office via conference call. ZVRS and Purple reaffirmed their petition to permanently authorize at-home call handling program.<sup>1</sup> ZVRS and Purple stressed that the program provides the same level of security and user experience as a traditional call center. ZVRS and Purple also highlighted the need to eliminate the requirement that each Communications Assistant (“CA”) handling calls through the at-home call handling program to have at least three years of experience as a call center CA,<sup>2</sup> and urged a waiver of this requirement which is artificially restricting the already short supply of qualified interpreters.

Respectfully submitted,

/s/

Gregory Hlibok  
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cc: Karen Peltz Strauss  
Eliot Greenwald  
Robert Aldrich

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<sup>1</sup> Petition for Rulemaking to Permanently Authorize At-Home Video Relay Service Call Handling by CSDVRS, LLC, d/b/a ZVRS and Purple Communications, CG Docket Nos. 03-123, 10-51, 6 (filed Aug. 29, 2018).

<sup>2</sup> Request for Expedited Limited Waiver by CSDVRS, LLC, d/b/a ZVRS and Purple Communications, CG Docket Nos. 03-123 (filed Dec. 11, 2018).

